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Secretary for
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Protection

California Regional Water Quality Control Board

Santa Ana Region

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MCAS EL TORO
SSIC #5090.3

September 18, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
MCAS El Toro
P.O. Box 51718
Irvine, California 92619-1718

COMMENTS ON GROUNDWATER MONITORING DATA SUMMARY REPORT, 1999 MONITORING ROUNDS 9,10, & 11, FORMER MARINE CORPS AIR STATION, EL TORO

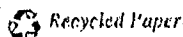
Dear Mr. Gould:

We have completed our review of the above referenced document, dated June 30, 2000, which we received on August 8, 2000. We have the following comments on this report:

1. The data, as presented in the report, are insufficient to allow us to interpret the groundwater quality at Sites 2, 3, 5, 17, 18, and 24. The report contains the results from three rounds of groundwater monitoring during 1999; however, the data are presented in the form of summary tables. As with your previous monitoring report (Round 8, 1998), this report lacks specific information that you agreed to provide, in accordance with the *CERCLA Groundwater Monitoring Plan for Marine Corps Air Station, El Toro*. Your groundwater monitoring reports should include the trend analyses for groundwater contaminants of concern, a discussion of the significance of the analytical results, and all relevant maps and data plots to clearly describe the sampling locations and present the analytical results.
2. You should explain your decision to quantify specific additional compounds in groundwater at some locations, as required under Section 3.4 and Table 3-7 of the *CERCLA Groundwater Monitoring Plan for Marine Corps Air Station, El Toro*.
3. We request that the water level data be presented in a map form, with isopleths of the potentiometric surface. Additional water-bearing zones should also be shown, if data are available.
4. There was no advance request or explanation for the delay in conducting each of the three quarterly sampling rounds, or the late submittal of the analytical results. According to Sections 6.2.1 and 6.2.2 of the *CERCLA Groundwater Monitoring Plan for Marine Corps Air Station, El Toro*, the quarterly and semi-annual groundwater monitoring results are to be submitted within three months of each sampling event.

Based on the content of the groundwater monitoring reports for Rounds 8 through 11, 1999, we believe that your program has failed to meet the basic requirements for an adequate groundwater characterization. We therefore conclude that your program lacks a commitment to

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monitor and assess the impacts to groundwater that have resulted from activities at the former air station. Please include this topic as a specific agenda item for the September 27, 2000 El Toro BCT meeting, so that we can discuss measures to improve the base's groundwater monitoring program, and possibly prevent delays in transferring the base property. If you have any questions regarding this letter, please call me at (909) 782-4498, or you may call Ann Sturdivant, Chief of our SLIC/DoD/AGT Program, at (909) 782-4904.

Sincerely,



John Broderick
SLIC/DoD/AGT Section

cc: Mr. Glenn Kistner, U.S. Environmental Protection Agency, Region IX
Ms. Triss Chesney, Department of Toxic Substances Control, OMF
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro
Ms. Content Arnold or Ms. Lynn Hornecker, Naval Facilities Engineering Command,
SWDIV

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